

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT  
EASTERN DIVISION**

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**WELLY CHANDRA, et al.**

**Plaintiff,**

**v.**

**BOEING INTERNATIONAL SALES  
CORPORATION, a Washington State  
Profit Corporation, et al.**

**Defendant.**

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**Lead Case No. 18 CV 7686  
Honorable Thomas M. Durkin**

**RESPONSE TO ORDER TO SHOW CAUSE**  
**[UNDER SEAL]**

GIRARDI KEESE, by its attorneys, MONICO & SPEVACK, submits this response at the Court's direction. On December 3, 2020, the Court asked GIRARDI KEESE to file a written response to show cause why he should not be held in contempt for violating the Court's orders by December 10, 2020. DKT 843. Filed *under seal* herewith is responsive information and accompanying supporting documents.

1. MONICO & SPEVACK has been retained by GIRARDI KEESE ("Respondent") for purposes of responding to an order to show cause (the "Order") issued by the Court on December 3, 2020. [DKT 843].
2. MONICO & SPEVACK is informed and understands that counsel at Respondent has been attempting to assemble responsive information since receipt of the Court's Order. However, MONICO & SPEVACK was first retained on December 10, 2020. The ability of respondent and MONICO & SPEVACK to assemble and prepare

- relevant responsive information has been impeded by the lack of staff incident to the COVID-19 Pandemic, and the volume and complexity of the materials.
3. Respondent apologizes to the Court for the untimeliness of this response and seeks the Court's acceptance of this filing.
  4. At present, there are few attorneys and staff who remain employed at the Girardi Keese law firm ("GK"). Attorneys Keith Griffin and David Lira, who were materially involved in the Lion Air cases now at issue, are no longer with GK. John Girardi has been counsel at GK for over forty-four years.
  5. John Girardi was not involved in the representation of the six Lion Air matters listed in the Verified Motion for Rule to Show Cause [DKT 842] that was submitted to the Court by Edelson PC, and that are the subject of the Court's Order.
  6. Upon receipt of the Court's Order, John Girardi commenced an internal investigation to evaluate the relevant information. The scope of his investigation has been limited by the time and resources available, which has been limited by reason of multiple attorneys and staff having recently departed the GK firm, and the limited personnel available to assist due to the ongoing pandemic.
  7. The Lion Air plaintiffs enumerated in the Edelson firm's motion are: Anice Kasim [DKT 379, 384], Septiana Damayanti [DKT 410, 419], Bian Daniaty Binti Udin Zaenudin [DKT 420, 424], Bias Ramadhan A.S. Bin Misyadi [DKT 425, 427], Dani Andrian [DKT 574, 576], and Puji Lestari [DKT 586, 588].
  8. Attached as Exhibit A is a spreadsheet prepared at John Girardi's direction by GK's accountant. The spreadsheet shows the disbursements made by the GK firm to four of the six plaintiffs referenced above. Each of these plaintiffs has received

approximately [REDACTED] of the total amount owed to them as a consequence of their settlements. They are each approximately owed an additional \$500,000, for an approximate total of \$2 million that remains outstanding.

9. We are informed and, on that basis believe that the GK firm does not anticipate the immediate ability to disperse the preceding outstanding funds.
10. Attached as Exhibit B are wire transfer confirmations of the disbursements to the plaintiffs referenced in the preceding paragraph and accompanying spreadsheet at Exhibit A.
11. We are informed and, on that basis believe that the accounting records for the other two referenced plaintiffs were maintained by former GK partner David Lira. Mr. Lira has informed John Girardi that 100% of the settlement proceeds intended for these two plaintiffs was fully disbursed to them through his associated counsel, attorney F. Anthony Koushan. Mr. Koushan has been asked to provide copies of wire transfer confirmations for those disbursements.
12. To the extent we have been able, under the present constraints, we have attempted to assess other disbursements by the GK firm of funds received from Boeing, as alleged in the Edelson firm's motion, and the parallel lawsuit in which it seeks to collect funds that it states are owed to it (*see Edelson PC v. Thomas Girardi, et al.*, 20-cv-7115 (Docket # 1)).

WHEREFORE, GIRARDI KEESE respectfully submits this response at the Court's direction.

/s/ Michael D. Monico  
Michael D. Monico  
Affidavit of Service

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